



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

May 30, 2011

Jeff Tomac  
Whitman District Ranger  
P.O. Box 947  
3285 11<sup>th</sup> Street  
Baker City, Oregon 97814

Re: U.S. Environmental Protection Agency (EPA) Comments for the Wallowa-Whitman National Forest (Forest), Whitman Ranger District; Snow Basin Vegetation Management Project (Project) Draft Environmental Impact Statement (DEIS) (EPA Project Number: 08-065-AFS).

Dear Mr. Tomac:

This review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Under our policies and procedures, we evaluate the environmental impact of the proposed action and the adequacy of the impact statement. We have assigned a Lack of Objections (LO) rating to the DEIS. A copy of the EPA rating system is enclosed.

EPA supports the Project Objectives<sup>1</sup> and believes the preferred alternative (Alternative 2) would best meet those objectives. The preferred alternative proposes a Forest Plan Amendment to allow for the harvest of trees 21 inches in diameter and above. EPA believes the Forest has appropriately interpreted the Regional Forester's June 11, 2003 letter which provides examples where a forest plan amendment of the Screens is appropriate. The preferred alternative's proposed harvesting of live trees larger than 21 inches in diameter would result in, for example, (i) more characteristic Ponderosa Pine and Western Larch single layer Late/Old Structure; and, (ii) more restored stands of quaking aspen.

Below, we describe opportunities for mitigation measures which we believe could be accomplished with minor changes to the proposal.

**Transportation System**

EPA supports efforts to close and decommission unnecessary roads because roads contribute more sediment to streams than any other management activity and interrupt the subsurface flow of water, particularly where roads cut into steep slopes. In addition, roads and their use contribute to habitat fragmentation, wildlife disturbance, the introduction or exacerbation of noxious weeds, and increased fire danger from recreational activities.

The DEIS recognizes the above, and other, concerns about impacts from roads (e.g., "Trombulak and Frisell (2000) identified seven general effects of forest roads." [p. 148]) and proposes to decommission 6 miles of roads. We commend the Forest for this proposal. We believe that every project involving travel management decisions presents an opportunity to reduce continuing road related adverse impacts on

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<sup>1</sup> Manage forest structure towards landscape HRV. Move the landscape toward a condition of reduced risk of high severity and extent of disturbance, taking into account changes in climate. Provide a supply of forest products to the public.

forest resources. Decommissioning roads is particularly important in project areas, like this one, where existing road densities exceed thresholds identified in the Forest Plan and are deemed, from a watershed condition baseline perspective (DEIS, Table 85), "unacceptable." Further, decommissioning roads where stabilization would benefit water quality - which this proposal would do -- is also important and consistent with the intent of the NEPA.

While we support the Forest's road decommissioning and the roads and transportation related Project Design Features / Best Management Practices / Mitigation Measures, we have issues with the potential impacts from the action alternatives' proposed road reconstruction. In particular, we are unclear about the potential impacts from the reconstruction of closed roads which "...are extensively grown in." (DEIS, p. 320). Reconstructing closed roads which have stabilized can have impacts similar to the construction of new roads, regardless of their administrative status. We also understand, however, that reconstructing roads which are ongoing sources of adverse impacts to forest resources can have beneficial effects.

**Recommendation:**

- We recommend the application of additional mitigation measures for the reconstruction of closed roads which have stabilized. Consider, for example, applying road rehabilitation contract requirements for temporary roads (i.e., B16.63) to reconstructed closed roads. Additional mitigation seems particularly appropriate for road reconstruction near streams (i.e., Conundrum Creek).

**Soils**

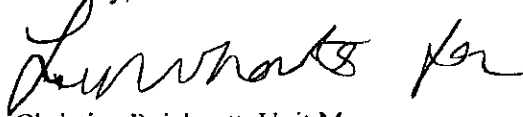
We appreciate the DEIS's disclosure regarding recent publications that have provided information on appropriate levels of coarse wood required to protect long-term soil productivity (p. 157). However, we are unsure how the action alternatives address this information.

**Recommendation:**

- We recommend the Final EIS include a Project Design Feature / Best Management Practices / Mitigation Measure which addresses levels of coarse wood required to protect long-term soil productivity.

Thank you for this opportunity to comment and if you have any questions or concerns please contact Erik Peterson of my staff at (206) 553-6382 or by electronic mail at [peterson.erik@epa.gov](mailto:peterson.erik@epa.gov).

Sincerely,



Christine Reichgott, Unit Manager  
Environmental Review and Sediment Management Unit

Enclosures:

EPA Rating System for Draft Environmental Impact Statements